

EXHIBIT O

Kathy Klein

From: Kathy Klein
Sent: Tuesday, December 12, 2023 11:08 AM
To: Patrick Sanders
Cc: Robert MacGill; Bundren, Brandon; Callas, Gretchen; John Jacobson; Nokes, Scarlett; Scott Klein; Scott Murray; Steve Mintz; Terence McCormick; Thomas J. Hurney, Jr. - Jackson Kelly PLLC (thurney@jacksonkelly.com); agoldstein@colelawgroup.com; gmarchetti@tpmblaw.com; matt@tpmblaw.com; tcole@colelawgroup.com; tpresnell@bradley.com
Subject: RE: Hunt v. SBC, et al

We are available at 1 pm eastern on Thursday, but please note that Steve Mintz has a hard stop at 1:35 pm that day.



Katharine R. Klein
1906 West End Ave.
Nashville, TN 37203
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From: Patrick Sanders <patrick.sanders@macgilllaw.com>
Sent: Tuesday, December 12, 2023 8:03 AM
To: Kathy Klein <KKlein@rjfirm.com>
Cc: Robert MacGill <robert.macgill@macgilllaw.com>; Bundren, Brandon <bbundren@bradley.com>; Callas, Gretchen <gcallas@jacksonkelly.com>; John Jacobson <JJacobson@rjfirm.com>; Nokes, Scarlett <snokes@bradley.com>; Scott Klein <Klein@mintzandgold.com>; Scott Murray <Scott.Murray@macgilllaw.com>; Steve Mintz <mintz@mintzandgold.com>; Terence McCormick <McCormick@mintzandgold.com>; Thomas J. Hurney, Jr. - Jackson Kelly PLLC (thurney@jacksonkelly.com) <thurney@jacksonkelly.com>; agoldstein@colelawgroup.com; gmarchetti@tpmblaw.com; matt@tpmblaw.com; tcole@colelawgroup.com; tpresnell@bradley.com
Subject: Re: Hunt v. SBC, et al

Kathy,

We are available Thursday at 1:00pm Eastern. Please let us know if that works for your team and I will send out a zoom invite.

Patrick Sanders
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EXHIBIT O

On Mon, Dec 11, 2023 at 11:19 AM Kathy Klein <KKlein@rjfirm.com> wrote:

Rob:

Steve Mintz is not available for a meet and confer until Thursday. Please let us know a time on Thursday that works for you. As to Hunt's "need" to begin motion to compel proceedings immediately, that certainly is your choice; however, Hunt's decision to wait until January to try to schedule any depositions of potential witnesses, including third-parties, has nothing to do with Guidepost.

I look forward to hearing from you.

Kathy

RILEY &
JACOBSON
PLLC

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From: Robert MacGill <robert.macgill@macgilllaw.com>

Sent: Saturday, December 9, 2023 6:24 AM

To: Kathy Klein <KKlein@rjfirm.com>

Cc: Bundren, Brandon <bbundren@bradley.com>; Callas, Gretchen <gcallas@jacksonkelly.com>; John Jacobson <JJacobson@rjfirm.com>; Nokes, Scarlett <snokes@bradley.com>; Scott Klein <Klein@mintzandgold.com>; Scott Murray <Scott.Murray@macgilllaw.com>; Steve Mintz <mintz@mintzandgold.com>; Terence McCormick <McCormick@mintzandgold.com>; Thomas J. Hurney, Jr. - Jackson Kelly PLLC (thurney@jacksonkelly.com) <thurney@jacksonkelly.com>; agoldstein@colelawgrouppc.com; gmarchetti@tpmblaw.com; matt@tpmblaw.com; patrick.sanders@macgilllaw.com; tcoble@colelawgrouppc.com; tpresnell@bradley.com

Subject: Re: Hunt v. SBC, et al

Thank you for your letter, Kathy.

Please let us know a time on Tuesday that works for you to meet and confer on these depositions. We are hopeful we can agree to a schedule on Tuesday. If not, we will pursue next steps in relation to a Motion to Compel the testimony on Wednesday morning.

Given the delays in the case stemming from the refusal of Guidepost to comply with basic discovery requirements, we understand the needs to pursue our rights.

Best regards.

Robert D. MacGill
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P Please consider the environment before printing this email.

On Fri, Dec 8, 2023 at 9:01 PM Kathy Klein <KKlein@rjfirm.com> wrote:

Counsel:

Attached is a letter regarding Plaintiff's Notices of Deposition for Guidepost's employees.

Kathy